

## REMARKS

Claims 1-9, 11-16 and 19-23 remain for further consideration. No new matter has been added.

The objections and rejections shall be taken up in the order presented in the Official Action.

1. Claims 1-9, 11-16 and 18-23 currently stand rejected for allegedly being obvious in view of the combined subject matter disclosed in U.S. Patent 6,377,860 to Gray (hereinafter “Gray”) and U.S. Patent 6,150,925 to Casazza (hereinafter “Casazza”).

The present invention is directed to a technique for data exchange in a vehicular multimedia system. The vehicle multimedia system includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle. The system establishes a radio connection between the interface unit and an external unit, and the interface unit receives, from the multimedia units, requests for the radio connection with the external unit. The interface unit then coordinates/arbitrates requests for a radio connection to the external unit. The claimed invention is patentable over the combination of Gray and Casazza for at least several reasons.

First, claim 1 recites “*coordinating/arbitrating at the interface unit requests for radio connection to the external unit*” (cl. 1). The combined teachings of Gray and Casazza neither discloses nor suggests an interface unit that receives requests for a radio connection with an external unit, from multimedia units. Significantly, the combined teachings of Gray and Casazza neither discloses nor suggests coordinating/arbitrating requests for a radio connection to an external unit. A fair and proper reading of the combination of Gray and Casazza fails to reveal that the control unit, or any other unit, coordinates/arbitrates requests from other units connected along the bus system for

access to an external unit via a wireless channel.

Second, the Official Action contends that FIG. 3 of Gray discloses each of the features of claim 1 with the exception of the radio connection between the interface unit and the external unit. (see Official Action, pg. 3). The Official Action contends that the CD player 220, the radio and tape player 230 and the GPS 240 read on the multimedia media units recited in claim 1. However, this can not be true since NONE of the units 220, 230 and 240 of Gray requests a connection (either wireline or wireless) to an external unit (i.e., a unit not physically connected to the network).

Third, the Official Action further contends that “[t]he vehicle interface device as illustrated in figure 3 acts as the claimed interface by receiving the input requests from the user.” (Official Action, pg. 3). However, the interface to vehicle network(s) 340 illustrated in FIG. 3 of Gray is part of the vehicle control center 110 (FIG. 2), and is simply used as an interface between the CPU 300 of the vehicle control center 110 (FIG. 2) and the devices 200, 210, 220, 230, 240 and 250 connected to the bus as shown in FIG. 2 of Gray. The interface 340 of Gray is simply not used to communicate with an external unit as forth in claim 1.

Fourth, assuming for the moment without admitting that Gray and Casazza are even combinable, modifying Gray as suggested in the Official Action would cause Gray to no longer operate for its intended purpose. Specifically, if Gray is modified so the interface 340 communicates via a radio connection, then the units 220, 230 and 240 of Gray would communicate with the interface 340 via the radio connection. However, connecting the units 220, 230 and 240 with the interface 340 via the radio connection would mean that the “plug and play” system of Gray would no longer operate since the units 220, 230 and 240 are no longer plugged into the network in order to be detected and acknowledged as being part of the network. That is, if the units 220, 230 and 240 of Gray are not physically plugged into the network, the plug and play system of Gray will not function

for its intended purpose.

Accordingly, a fair and proper reading indicates that Gray in combination with Casazza neither discloses nor suggests:

“A method of data exchange in a vehicular multimedia system that includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle, comprising:

establishing a radio connection between the interface unit and an external unit;

receiving from the multimedia units requests for the radio connection with the external unit; and

coordinating/arbitrating at the interface unit requests for radio connection to the external unit.” (cl. 1, emphasis added).

#### CLAIM 6

Claim 6 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The system includes an interface unit that establishes a radio connection with an external unit, “...*where the interface unit comprises a coordination unit that coordinates requests received over the data bus from the multimedia units for radio connections to the external unit.*” (cl. 6). As set forth above, the combination of Gray and Casazza neither discloses nor suggests a coordination unit that coordinates requests at the interface unit for radio connection to the external unit. Notably, the combination of Gray and Casazza neither teaches nor suggests an interface unit having “*a coordination unit that coordinates requests ... from the multimedia units for radio connections to the external unit.*” (cl. 6). Hence, the combination of Gray and Casazza is incapable of supporting an obviousness rejection of claim 6 for at least the same set forth above.

**CLAIM 13**


With respect to claim 13, the combination of Gray and Casazza neither discloses nor suggests an interface unit that "*coordinates requests generated by the multimedia units, the requests being for radio connection with the external interface.*" (cl. 13). Hence, for at least the reasons set forth above, the combination of Gray and Casazza is incapable of supporting an obviousness rejection of claim 13.

It is respectfully submitted that the rejection of the remaining claims (i.e., the dependent claims) is now moot since the independent claims are patentable for at least the reasons set forth above.

For all the foregoing reasons, reconsideration and allowance of claims 1-9, 11-16 and 18-23 respectfully requested.

If a telephone interview could assist in the prosecution of this application, please call the undersigned attorney.

Respectfully submitted,

A handwritten signature in cursive script, reading "Patrick J. O'Shea", written over a horizontal line.

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